

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA)
)
Plaintiff,)
)
v) No. 00-199-02-CR-W-NKL
)
STEPHEN V. SANDERS)
)
Defendant.)

**MOTION TO EXTEND DEFENDANT S
INCARCERATION REPORTING DATE FROM
MARCH 17, 2003 TO MAY 2, 2003**

COMES NOW defendant, by counsel, and moves the Court to enter an Order extending defendant s date to report to commence his 32 month sentence from March 17, 2003 to May 2, 2003.

SUGGESTIONS IN SUPPORT

The Court has previously extended defendant s date to report from January 13, 2003 to March 17, 2003. Attached hereto and made a part hereof is defendant s letter to the Court setting out the reasons for seeking an additional extension.

Counsel can only state that the sentence remains to be served, if extended, and has no reason to believe said extension is sought for reasons other than that expressed in the attached memorandum.

WHEREFORE, for the reasons above-stated, counsel moves the Court for an Order extending defendant s date to report to commence his 32 month sentence from March 17, 2003 to May 2, 3003.

RESPECTFULLY SUBMITTED,

/s/ Will Bunch

WILL BUNCH #19527
P. O. Box 28218
Kansas City, Missouri 64118
(816) 468-7266
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CERTIFICATE OF SERVICE

I CERTIFY that a copy of the above and foregoing was sent by FAX this 11th day of March, 2003, to: Catherine Connelly, Assistant U. S. Attorney, 426-5186, and to: Stephanie J. Dumolt, Probation Officer, 512-1313.

/s/ Will Bunch

WILL BUNCH

Dear Judge Laughery,

Since the extension I was given I have satisfactorily completed many of the tasks that I set out to. My grandmother has been moved from the nursing home to an elderly apartment complex. She has her apartment set-up and is adjusting well to her new surroundings. Unfortunately this has not allowed me ample time to sell her home, leaving the financial responsibility for the \$750.00 payment to Mary in my absence.

In dedicating my available time to my Grandmother, a problem with my son Stephen has arisen. On March 3, 2003 Stephen was suspended from school for forty-five days. This suspension leaves him in our daily care, which needless to say is next to impossible to do and maintain full-time employment. Mary's mother is seventy-seven and has recently developed health problems that make it impossible for her to care for Stephen 24/7. If I was allowed 45 days to see this problem through it would be very valuable to Stephen. He is in a very emotionally unstable state. I could also provide assistance with his care for the next 45 days relieving some of the burden from my wife and mother-in-law.

Judge Laughery your patience and understanding are greatly appreciated by myself and my family. A forty-five day extension would allow for my family and myself to make a smooth transition and provide for my family's best interest.

Sincerely,

/s/Vince Sanders
Vince Sanders